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Attorneys for Defendant  
 Northwest Airlines, Inc.

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

	)	Case No. C 03-04957 MMC
	)	<b>ORDER DENYING</b>
	)	<b>AMENDED STIPULATION AND</b>
12 WILLIAM R. KLEMME, M.D.,	)	<b>[PROPOSED] ORDER FOR EXTENSION OF</b>
	)	<b>DISCOVERY DEADLINES AND</b>
13 Plaintiff,	)	<b>CONTINUANCE OF STATUS</b>
	)	<b>CONFERENCE</b>
14 v.	)	
	)	[ Civil LR 6-1 (b), 6-2 (a), 16-2.]
15 NORTHWEST AIRLINES, INC.; BLACK	)	
16 COMPANY; WHITE COMPANY; BLUE	)	
16 COMPANY; RED COMPANY; and DOES 1	)	
through 100, inclusive,	)	Complaint filed: September 6, 2003
	)	
17 Defendants.	)	Trial Date: August 20, 2007
	)	(reset after case reopened
	)	lifting bankruptcy stay)

This case was automatically stayed September 22, 2005, as a result of Defendant's filing of a notice of bankruptcy. Prior to September 22, 2005, the trial in this matter had been continued four times, due to continued mediation efforts, Plaintiff's condition, and the need to obtain Plaintiff's VA medical records. It was not until February 2007, that Defendant received the long-awaited records of Plaintiff related to his pending disability claim with the Veteran's Administration that had been originally subpoenaed August 16, 2004, and September 1, 2004.

Counsel for the parties met today with mediator William Strickland for further mediation, and have agreed to a further mediation May 18, 2007. In addition, it was agreed that the parties will

informally disclose evaluations or reports prior thereto, with the exception that formal reports, as well as liability expert disclosures, are reserved as per the dates set forth below.

In light of the recent receipt of vital records and the parties' continued mediation efforts with mediator, William R. Strickland, the parties hereto, by and through their respective counsel, hereby agree and stipulate, pursuant to Civil L.R. 6-1 (b), 6-2, and 16-2, to an extension of expert discovery and dispositive motion deadlines, and a continuance of the further status conference.

The parties hereto, by and through their respective counsel, hereby agree and stipulate to extend discovery deadlines, as follows:

1. Experts shall be disclosed and reports provided by plaintiff and defendant by 6/13/07. (presently March 30, 2007)
2. Rebuttal experts shall be disclosed and reports provided 6/20/07. (presently set for 4/13/07)
3. All discovery from experts shall be completed by 7/15/07. (presently set for 5/4/07)
4. Dispositive motions shall be filed no later than 7/15/07, to be heard on shortened time. (presently set for 5/18/07)
5. Further Status Conference Statement due 6/8/07. (presently set for 5/18/07)
6. Further Status Conference 6/15/07. (presently set for 5/25/07)

This stipulation may be executed in counterparts by facsimile, each of which shall be deemed an original, but which taken together will constitute one and the same document.

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1 IT IS SO STIPULATED.

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3 Date: March 21, 2007

LAW OFFICES OF SARA A. SIMMONS, APC

4  
5 By: /s/

6 Sara A. Simmons  
7 Attorneys for Defendant  
8 Northwest Airlines, Inc.

9 Date: March 21, 2007

LAW OFFICES OF J. FRANK GEORGE, APC

10  
11 By: /s/

12 J. Frank George  
13 Attorneys for Plaintiff  
14 William R. Klemme, M.D.

15 The above stipulation fails to provide adequate time for the parties and the Court to prepare for  
16 the August 7, 2007 pretrial conference and, accordingly, is hereby DENIED, without prejudice  
17 to the parties' submitting a revised proposal.

18 Dated: March 21, 2007

